

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
PECOS DIVISION**

<b>MARY CATHERINE “KATIE” SANCHEZ,</b>	§	
	§	
Plaintiff,	§	
	§	
v.	§	No. 4:19-CV-00037-DC-DF
	§	
<b>PRESIDIO COUNTY, TEXAS</b> and	§	
<b>FRANCES GARCIA</b> in her individual capacity,	§	
	§	
Defendants.	§	

**PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS**

**TO THE HONORABLE DAVID COUNTS, U.S. DISTRICT COURT JUDGE:**

COMES NOW, Plaintiff, Mary Catherine “Katie” Sanchez, and files this, her Proposed Voir Dire Questions to the jury:

1. Does anyone on the panel know the Plaintiff, Mary Catherine “Katie” Sanchez?
2. Does anyone on the panel know Ms. Sanchez’s attorney, John Wenke?
3. One Defendant in this case is Presidio County, Texas. Has anyone ever worked for, or has a family member or friend who has worked for Presidio County? If yes, please explain.
4. Does anyone on the panel know the attorneys for Presidio County and Frances Garcia, Jon Mark Hogg or Amanda Crouch of the law firm of Jackson Walker in San Angelo, Texas?
5. Does anyone on the panel know any attorneys for the law firm of Jackson Walker?
6. Jon Mark Hogg, the attorney for Presidio County, recently ran for U.S. Representative. Does anyone have any opinion about Mr. Hogg’s run for office that would affect their deliberations in this case?
7. The other Defendant in this case is Presidio County’s Treasurer, Frances Garcia. Does anyone know Ms. Garcia?
8. Has anyone on the panel, or a close family member, ever run for office?

9. Does anyone in their current or past jobs have the authority to terminate workers? If so, who, and what is your job title and the name of your employer?
10. Have you or your family members ever work in a human resources department? If so, who, and what is the job title and name of the employer?
11. Have you or your family members ever own a business? If so, who and what is the name of the business?
12. Have you or your family members ever been sued (this does not include divorce or other family law matters)? If so, please state who and the type of claim?
13. Ms. Sanchez is alleging that Presidio County and Frances Garcia retaliated against her for exercising her First Amendment Right of running for political office. If she is successful, you will be asked to consider awarding damages. One type of damage that you will consider is “compensatory damages”. “Compensatory damages” include emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life, and other nonpecuniary damages. Is there anyone who would have a problem awarding reasonable “compensatory damages”, if such damages were proven by the Plaintiff?
14. In some circumstances, a jury may be asked to consider awarding “punitive damages” to punish an employer if you find the employer acted with malice or reckless indifference in taking an adverse employment action against an employee. If Mark Clark proves that the Presidio County Treasurer, Frances Garcia, acted with malice or reckless indifference in retaliating against Katie Garcia for exercising her First Amendment right to run for office, is there anyone who would have a problem awarding reasonable “punitive damages”?
15. Is there anyone who has previously served as a jury foreperson? If yes, was it a criminal or civil case? Was a verdict rendered?

Respectfully submitted,

/s/ John A. Wenke

**JOHN A. WENKE**

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ATTORNEY FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I certify that I electronically filed the foregoing with the clerk using the CM/ECF system, which will send notification of such filing to Jon Mark Hogg, Jackson Walker, 136 W. Twohig Ave., Suite B. San Angelo, Texas 76903, Attorney for Defendants.

/s/ John A. Wenke  
**JOHN A. WENKE**